

Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
Seth A. Sloan
State Bar No. 24098437
CROWE & DUNLEVY, P.C.
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 214.420.2163
Facsimile: 214.736.1762
Email: vickie.driver@crowedunlevy.com
Email: crissie.stephenson@crowedunlevy.com
Email: seth.sloan@crowedunlevy.com

COUNSEL FOR THE DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § **Chapter 11**
§
WEST HOUSTON MEMORY CARE, LLC,¹ § **Case No. 19-31485-sgj-11**
§
Debtor. §

**MOTION FOR ORDER PERMITTING ATTORNEY SETH A. SLOAN
TO WITHDRAW AS COUNSEL TO THE DEBTOR**

TO THE HONORABLE STACY G.C. JERNIGAN,
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Seth A. Sloan (“Sloan” or “the Movant”), and hereby submits this *Motion for Order Permitting Attorney Seth Sloan to Withdraw as Counsel to the Debtor* (the “Motion”), West Houston Memory Care, LLC (the “Debtor”), in the above-captioned matter, pursuant to Local Bankruptcy Rule 2091-1 of the United States District Court for the Northern District of Texas, and in support thereof, would show as follows:

¹ Last four EIN 276

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b).
2. The basis for relief herein is Local Bankruptcy Rule 2091-1 of the United States District Court for the Northern District of Texas.

II. BACKGROUND

3. On May 2, 2019 (the “Petition Date”), the Debtor filed its voluntary petition under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

4. On June 1, 2019, the Debtor submitted the Application for Entry of an Order Authorizing the Retention and Employment of Crowe & Dunlevy, PC (the “C&D Employment Application”) [LaSalle Docket No. 114]. C&D’s employment was subsequently approved pursuant to that certain order entered by the Court on July 23, 2019 [LaSalle Docket No. 227] (the “C&D Retention Order”).

5. C&D attorneys Vickie Driver, Christina Stephenson and Seth Sloan have served as Debtor’s counsel throughout the pendency of this case.

6. Mr. Sloan is leaving his employment at C&D effective September 1, 2021.

III. RELIEF REQUESTED

7. Mr. Sloan hereby seeks formal withdrawal as an attorney of record for the Debtor in the above-reference case for good cause. Withdrawal is necessary because Sloan is leaving his employment at C&D and the Debtor desires to continue to its retention of C&D as Debtor’s counsel.

8. If this Motion is granted, C&D attorneys Vickie Driver and Christina Stephenson will continue to serve as Debtor’s counsel. Their contact information is as follows:

Vickie L. Driver
Christina W. Stephenson
2525 McKinnon Avenue, Suite 425
Dallas, TX 75201
Telephone: 214.420.2163
Facsimile: 214.736.1762
Email: vickie.driver@crowedunlevy.com
Email: crissie.stephenson@crowedunlevy.com

9. Based on the foregoing, the Movant respectfully requests that he be permitted to withdraw as counsel for the Debtor.

10. The granting of the relief requested in this Motion will not prejudice any of the parties in this case.

WHEREFORE, the Movant respectfully requests entry of the proposed form of Order Authorizing Attorney Seth A. Sloan to Withdraw as Counsel to the Debtor and for entry of such other and further relief as the Court deems just and proper.

Dated: August 26, 2021.

Respectfully submitted,

/s/ Vickie L. Driver
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
Seth A. Sloan
State Bar No. 24098437
CROWE & DUNLEVY, P.C.
2525 McKinnon Avenue, Suite 425
Dallas, TX 75201
Telephone: 214.420.2163
Facsimile: 214.736.1762
Email: vickie.driver@crowedunlevy.com
Email: crissie.stephenson@crowedunlevy.com
Email: seth.sloan@crowedunlevy.com

COUNSEL FOR THE DEBTOR

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on August 26, 2021, I caused to be served the foregoing pleading upon the parties that receive service via the Court's electronic transmission facilities.

/s/ Vickie L. Driver

Vickie L. Driver